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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PACIFIC CENTURY INTERNATIONAL)
LTD.,)
Plaintiff,)
v.)
DOES 1-48,)
Defendant(s).)

No. C-11-03823 MEJ
RULE 26(f) REPORT

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Plaintiff Pacific Century International LTD, by and through its counsel, hereby submits this Rule 26(f) Report pursuant to the Court’s Order Setting Initial Case Management Conference and ADR Deadlines (Doc. No. 2), Federal Rules of Civil Procedure (hereinafter “FRCP”) Rules 26(a)(1) and 26(f), and Northern District of California Civil Local Rule (hereinafter “L.R.”) 16-9(a):

1. Individuals Likely to Have Discoverable Information:

- Victor Chang, Manager of Pacific Century
- Peter Hansmeier – 161 North Clark Street, Suite 3200, Chicago, Ill., 60601.
- Person Most Knowledgeable (“PMK”) at each ISP’s Subpoena Department listed in Exhibit A of the Complaint – Legal Department Compliance Contact Information.

- 1 • Subscriber(s)/Doe Defendant(s) – Currently unidentified.
- 2 • Plaintiff reserves the right to add to this list of individuals identified as necessary in
- 3 the future.

4 **2. Documents, Electronically Stored Information, and Tangible Things:**

- 5 • Physical Documents – Plaintiff's copyright records.
- 6 • Electronically Stored Information – BitTorrent auditor, forensic information
- 7 demonstrating infringing activity over the BitTorrent.

8 **3. Projected Discovery Timelines:**

9 At this point, any projected timelines are premature for reasons explained in Plaintiff's Case
10 Management Conference Statement. (See ECF No. 12).

11 **4. Subjects on Which Discovery, Including Electronic Discovery, Will be Needed:**

12 As noted in Plaintiff's Case Management Conference Statement (ECF No. 12), at this point,
13 Plaintiff is merely waiting on its subpoena returns. Once that information is received, Plaintiff will
14 have a better idea of whether or not further discovery will be necessary in order to properly, and in
15 good faith, name certain Doe Defendants in this case. As of now, however, it is entirely premature
16 to speculate on this issue before even receiving the relevant information from the ISPs.

17 **5. Objections:**

18 Plaintiff objects to the Court requiring Plaintiff to make any projected deadlines in this case
19 at this time.

20 **6. Discovery Motion Currently Pending:**

21 N/A.

22 **7. Other Issues:**

23 N/A.

Respectfully Submitted,

STEELE HANSMEIER PLLC,

DATED: November 4, 2011

By: /s/ Brett L. Gibbs, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 4, 2011, all individuals of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document, and all attachments and related documents, using the Court's ECF system, in compliance with Local Rule 5-6 and General Order 45.

/s/ Brett L. Gibbs
Brett L. Gibbs, Esq.